

**Before a Decision-Making Committee
Of the Environmental Protection Authority**

APP203660

Under the Hazardous Substances and New Organisms Act 1996

In the matter of the modified reassessment of methyl bromide

By **Stakeholders in Methyl Bromide Reduction Inc**
Applicant

12TH MEMORANDUM OF COUNSEL FOR THE APPLICANT

24 APRIL 2020

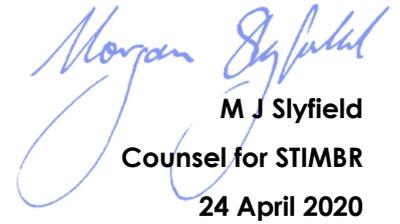
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1. This memorandum responds to paragraph 9(e) of Direction and Minute WGT011.
2. In its 11th memorandum, dated 9 April, STIMBR identified that the estimated delivery date for its expert to complete the additional air dispersion modelling and associated report was dependant on the provision of information by other parties, as required in paragraphs 9(a)-(c) of Direction and Minute WGT011.
3. The information requested at 9(b) and 9(c) of WGT011 has been provided.
4. By paragraph 9(a) of WGT011, the Decision-making Committee (DMC) requested:

...that the Bay of Plenty Regional Council supplies meteorological data for 2017 to 2019 and for Atmospheric Science Global to convert this into a CALMET data set.
5. Bay of Plenty Regional Council (**BOPRC**) has supplied the meteorological data. As yet, it has not been converted by Atmospheric Science Global (**ASG**) into a CALMET data set. All the relevant experts have agreed that this conversion is necessary for robust model validation (as recorded in the joint expert statement dated 19 March 2020 at [11]).
6. The lack of the CALMET data set has not yet affected the work programme of STIMBR's modelling expert, Mr Sullivan. Mr Sullivan and two of his staff are presently working full-time on the air dispersion modelling, despite lockdown conditions. However, the continued lack of the CALMET data set will in due course prevent the modelling and associated report from being completed in the manner agreed by the experts.
7. Assuming the work is to be completed in the agreed manner, Mr Sullivan's ability to estimate a reliable completion date is presently dependant on BOPRC and/or ASG confirming when the CALMET data set will be provided.

8. If BOPRC and/or ASG are unwilling to produce the CALMET data set, STIMBR can request Mr Sullivan to add the conversion to his existing work programme. However, STIMBR estimates this will delay the final report to 15 June 2020.



M J Slyfield
Counsel for STIMBR
24 April 2020